

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
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UNITED STATES OF AMERICA,

Plaintiff,

vs.

PAW MOO,

Defendant.

INDICTMENT

18 U.S.C. § 2320(a)(1)

The Grand Jury charges that

COUNT I
(Trafficking in Counterfeit Goods)

Beginning on an unknown date but as early as in or about October 2020, and continuing to on or about March 23, 2021, in the District of Nebraska, the defendant, PAW MOO, did intentionally traffic in goods as set forth below, and, on and in connection with such goods, knowingly used counterfeit marks identical to, and substantially indistinguishable from, genuine marks in use and registered for those goods on the principal register in the United States Patent and Trademark Office, to wit:

GOODS	COUNTERFEIT MARKS AND (QUANTITY OF ITEMS)
Handbags	Louis Vuitton (46); Michael Kors (14); Chanel (19), Coach (1); Gucci (9); Yves St. Laurent (25)
Belts	Louis Vuitton (1); Gucci (1)
Phone cases	Louis Vuitton (31)
Wallet	Gucci (1)
Sweatshirts/sweatpants	Nike (26); Puma (18); Champion (19); Adidas (14)
T-Shirt(s)	Chanel (1)
Blanket(s)	Louis Vuitton (1); Chanel (1)

And the use of such counterfeit marks on and in connection with such goods was likely to cause confusion, to cause mistake, and to deceive.

In violation of Title 18, United States Code, Section 2320(a)(1).

FORFEITURE ALLEGATION

1. The allegations contained in Count I of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2323.

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 2320(a)(1) set forth in Count I of this Indictment, the defendant, PAW MOO, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2323, any article, the making or trafficking of which is prohibited under section 2320, including but not limited to the following:

a. All counterfeit goods seized by U.S. Customs and Border Protection on or about February 23, 2021, and all counterfeit goods seized on or about March 23, 2021 from the residence of the defendant PAW MOO, as set forth in Count I.

b. A Money Judgment against the Defendants in favor of the United States of America:

i. a sum of money equal to the value of the property constituting, or derived from, any proceeds Defendants obtained, directly or indirectly, as a result of the offenses alleged in Count I.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

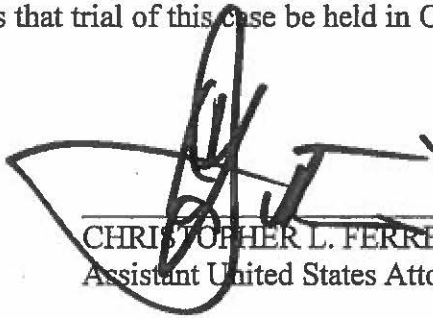
- e. has been commingled with other property which cannot be divided
without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2323(b)(2).

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.



CHRISTOPHER L. FERRETTI
Assistant United States Attorney